

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO: 2327

Honorable Joseph R. Goodwin

JOSEPH A. OSBORNE OF BABBITT JOHNSON
OSBORNE & LECLAINCHE'S APPLICATION FOR APPOINTMENT
TO PLAINTIFFS' STEERING COMMITTEE

COMES NOW JOSEPH A. OSBORNE of BABBITT JOHNSON
OSBORNE & LECLAINCHE, P.A., and respectfully submits an Application for
Appointment to the Plaintiffs' Steering Committee:

I earned a bachelor's degree from Brown University in 1987 and a law degree from the University of Florida in 1990. I am licensed to practice law in the State of Florida and am admitted to the United States District Court for the Southern District of Florida. I am a member of The American Association for Justice and the Multi-Million Dollar Advocates Forum. I have been practicing for over 20 years and have been with Babbitt Johnson Osborne & LeClainche since 1996. Our office is located in West Palm Beach, Florida. Our Firm is AV rated by Martindale-Hubbell and has been recognized by The South Florida Legal Guide, Legal Elite and the Daily Business Review for our track record and reputation. Personally, in 2010, I was a finalist for the South Florida Daily Business Review's lawyer of the year.

I limit my practice to complex civil litigation, including mass torts. I am currently liaison counsel and a member of the Plaintiff's Steering Committee in the Trasylol MDL No. 1928, pending in the United States District Court for the Southern District of Florida. I have been actively involved in all aspects of this case against Bayer Pharmaceutical including document review, depositions of Bayer witnesses, expert preparation and presenting and taking depositions of experts. I also prosecuted one of the bellweather cases from that litigation (Rodriguez v. Bayer, Case No. 1:08-MD-01928) which was settled before trial.

I currently am also serving on the Plaintiffs' Steering Committee in the Zimmer Nexgen Knee Products Liability Litigation (MDL No. 2272) before the Honorable Rebecca Daumeyer pending in Chicago, Illinois.

I have also been involved in a number of other mass torts and played a vital role in:

- A) Black v. Ethicon, et al., Case No: 502004CA002466XXXXMB (lead case) against Johnson and Johnson involving Intergel (a surgical Product).
- B) Holtsberg v. Citigroup, et al., Case No: 502004CA00837XXXXMB (lead case) involving securities losses due to diminution in value of World Com stock.

My Firm is also lead counsel in O'Shea v. Cordis Corp., et al., Case No: 502006CA013019XXXXMB (lead case) against Johnson and Johnson involving its Cypher cardiac drug eluting stents. I have also been involved in a number of other mass torts and/or MDLS including:

- Avandia product liability litigation
- Yaz/Yasmin/Ocella product liability litigation
- Depuy ASR metal on metal hip product liability litigation
- Depuy Pinnacle metal on metal hip product liability litigation

Reglan/Metaclopramide product liability litigation
Vioxx product liability litigation
PPA product liability litigation

I believe my background and training demonstrates the ability to work with other firms and to act in a representative capacity with respect to various interests amongst the clients and attorneys in this case. I also have the commitment and qualifications to accomplish all of the assigned tasks of the Plaintiffs' Steering Committee.

Babbitt Johnson Osborne & LeClainche, P.A. has filed cases in this litigation and currently represents many more clients with potential causes of action to be filed. We have filed cases against all four manufacturers involved in the MDL.

If asked to serve on the Plaintiffs' Steering Committee, I do not see any conflicts or strain on my Firm's resources.

DATED: This 28th day of March, 2012.

Respectfully submitted,

BABBITT JOHNSON OSBORNE & LECLAINCHE, P.A.

/s/ Joseph A. Osborne

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